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Co-Attorneys for Plaintiffs
 HENRY A. *et al.*

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

HENRY A., by his next friend M.J.; CHARLES
 and CHARLOTTE B., by their next friend R.D.;
 LEO C.; VICTOR C.; MAIZY and JONATHAN D.
 by their next friend S.W.; LINDA E.; CHRISTINE
 F., and OLIVIA G. by their next friend E.F., and
 MASON I., by his next friend M.J., individually
 and on behalf of others so situated,

Plaintiffs,

vs.

MICHAEL WILLDEN, Director of the Nevada
 Department of Health and Human Services; DIANE
 COMEAUX, former Administrator of

(Caption continued on following page.)

Case No.: 2:10-CV-00528-RCJ-PAL

**STIPULATION AND [PROPOSED]
 ORDER TO DISMISS ALL CLAIMS
 OF HENRY A., CHARLES B.,
 CHARLOTTE B., AND MASON I.
 WITH PREJUDICE**


1 Nevada Division of Child and Family Services;
2 AMBER HOWELL, Administrator of Nevada
3 Division of Child and Family Services; VIRGINIA
4 VALENTINE, former Clark County Manager;
5 DON BURNETTE, Clark County Manager;
6 CLARK COUNTY; TOM MORTON, former
7 Director of Clark County Department of Family
8 Services; LISA RUIZ-LEE, Director of Clark
9 County Department of Family Services; SYLVIA
10 CLARK, Senior Family Services Specialist;
11 YVETTE CHEVALIER, Caregiver Services
12 Manager; TERESA CRAGON, Case Manager;
13 DARREL FORD, Licensing Investigator; DEBBIE
14 MALLWITZ, Family Services Specialist II;
15 PATRICIA MARTIN, Family Services Specialist;
16 THOR MARTINEZ, Family Services Specialist I;
17 PHILOMENA OSEMWENGIE, Senior Family
18 Services Specialist; STACEY SCOTT, Family
19 Services Specialist I; SONYA WEATHERS,
20 Family Services Specialist II; and DOES XI-XX,
21
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28 Defendants.

1 PLAINTIFFS HENRY A., CHARLES B., CHARLOTTE B., and MASON I., and
 2 DEFENDANTS HEREBY STIPULATE AND AGREE, by and through their respective counsel,
 3 to the dismissal, with prejudice, of all claims of HENRY A., CHARLES B., CHARLOTTE B.,
 4 and MASON I., as against all Defendants in the above-entitled matter, pursuant to Federal Rule
 5 of Civil Procedure 41(a)(1)(A)(ii), but that the Court will retain personal and subject matter
 6 jurisdiction solely for the purpose of enforcing the terms of the Settlement Agreement and
 7 Release.

8 Except for the fees and costs to be paid by Clark County to Plaintiffs' counsel as provided
 9 in the parties' Settlement Agreement and Release, which was the subject of Joint Petition for
 10 Approval of Negotiated Attorneys' Fees & Costs approved by this Court [Dkt. 404], the parties
 11 will bear their own fees and costs.

12 **IT IS SO STIPULATED**


13 DATED this 5th day of February, 2015.

14 
 15 **ALVERSON TAYLOR MORTENSEN & SANDERS**
 16 **MORRISON & FOERSTER LLP**
 17 **NATIONAL CENTER FOR YOUTH LAW**
 By Karie N. Wilson, Esq.
 Attorneys for Plaintiffs

18 DATED this ____ day of _____, 2015.

19
 20
 21 **KOLESAR & LEATHAM**
 By Alan Lefebvre, Esq.
 Attorneys for Defendants Mallwitz
 and Chevalier

22
 23
 24 DATED this 10 day of February, 2015.

25 
 26 **LEWIS BRISBOIS BISGAARD & SMITH LLP**
 By Margaret G. Foley, Esq.
 27 Attorneys for Clark County and Defendants Ruiz-Lee,
 Morton, Burnette, Valentine, Clark, Cragon, Ford,
 28 Martin, Martinez, Osemwengie, Scott & Weathers

STIP. AND [PROPOSED] ORDER TO DISMISS ALL CLAIMS OF HENRY A., CHARLES B., CHARLOTTE B., AND MASON I.
 WITH PREJUDICE
 CASE NO. 2:10-CV-00528

PLAINTIFFS HENRY A., CHARLES B., CHARLOTTE B., and MASON I. and
 DEFENDANTS HEREBY STIPULATE AND AGREE, by and through their respective counsel,
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 and MASON I. as against all Defendants in the above-entitled matter, pursuant to Federal Rule
 of Civil Procedure 41(a)(1)(A)(ii), but that the Court will retain personal and subject matter
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 in the parties' Settlement Agreement and Release, which was the subject of Joint Petition for
 Approval of Negotiated Attorneys' Fees & Costs approved by this Court [Dkt. 404], the parties
 will bear their own fees and costs.

IT IS SO STIPULATED

DATED this ____ day of ____, 2015.

**ALVERSON TAYLOR MORTENSEN & SANDERS
 MORRISON & FOERSTER LLP
 NATIONAL CENTER FOR YOUTH LAW**
 By Karie N. Wilson, Esq.
Attorneys for Plaintiffs

DATED this 14 day of July, 2015.

KOLESAR & LEATHAM
 By Alan Lefebvre, Esq.
*Attorneys for Defendants Mallwitz
 and Chevalier*

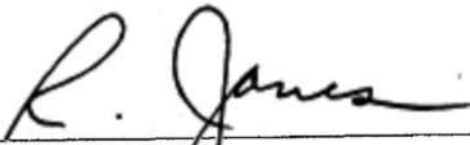
DATED this ____ day of ____, 2015.

LEWIS BRISBOIS BISGAARD & SMITH LLP
 By Margaret G. Foley, Esq.
*Attorneys for Clark County and Defendants Ruiz-Lee,
 Morton, Burnette, Valentine, Clark, Cragon, Ford,
 Martin, Martinez, Osemwengie, Scott & Weathers*

STIP. AND [PROPOSED] ORDER TO DISMISS ALL CLAIMS OF HENRY A., CHARLES B., CHARLOTTE B., AND MASON I.
 WITH PREJUDICE
 CASE NO. 2:10-CV-00528

1 **IT IS SO ORDERED.**

2
3 Dated this 21st day of July, 2015.

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6 _____
7 ROBERT C. JONES
8 UNITED STATES DISTRICT JUDGE